

**Before the
Federal Communications Commission
Washington, D.C.**

In the Matter of:

Request for Review of a Decision)	
by the Schools and Libraries Division)	
for Craig County Public Schools, Virginia)	Administrator's Decision
)	DTD January 13, 2003
Federal-State Joint Board on Universal)	
Service)	CC Docket No. 96-45
)	
Changes to the Board of Directors of the)	
National Exchange Carrier Association)	CC Docket No. 97-21

Request for Review of an Administrator's Decision

Craig County Public Schools
Entity Number: 126582
Form 471 Application number 307375
Funding Request Number 798103

Craig County, pursuant to section 54.719 of the Commission's Rules, hereby requests Commission review of a decision by the Universal Service Administrative Company (administrator) in the above captioned funding request.

This request for review is now before the Commission because the administrator has utterly failed to maintain a dialog with Craig County during the initial review of this application. Admittedly, Craig County shares culpability in this instance for failing to provide all information necessary for the administrator to make a proper decision. This entire ordeal could have been avoided had the administrator communicated with Craig County to clarify line item charges listed on a single telephone bill provided to the administrator for verification of service. Instead the entire funding request of \$832.10 was denied because "30% or more of this FRN includes a request for ruccuring cost for labour & parts which are ineligible monthly service(s) based on program rules." (spelling

errors left intact). With this decision, additional Craig County resources must be allocated to appeal, taxpayer dollars must pay the salaries of FCC lawyers to review the facts of this appeal – no doubt far beyond the \$832.10 in question here. If necessary, a Petition for Reconsideration may be filed, and perhaps even an Application for Review. All because the administrator was too burdened with thousands of other applications to bother following up on this single funding request.

Discussion

Craig County applied for Universal Service, E-Rate discounts in Funding Year 5 for telephone service to classrooms located in the automotive shop of Craig County public Schools. Craig County included a sample telephone bill as part of the Item 21 attachments required by program rules. Unfortunately, the particular telephone bill included a one-time telephone jack installation. Charges for the installation included the jack (\$4.00), Wire (\$4.00), and labor (\$ 60.00) for a total ineligible charge of \$68.00. The bill in question is enclosed as Attachment 1. The individual reviewing this application mistook this installation charge as recurring rather than the non-recurring, one-time charge it actually was. Several typical bills for services covered under this request are enclosed with this appeal as Attachment 2.

Craig County mistakenly believed the reason for denial was ineligibility of the building itself rather than the installation charge. Craig County now understands that was not the reason for denial.

It is clear that a typical monthly telephone bill does not include one-time installation charges. While the one-time installation charge is ineligible, the total amount

- \$68.00 – does not come close to the 30% level required for application denial, under SLD policy at the time of this application.

Craig County asks the FCC to grant this request for review and remand the application to the SLD for further processing.

Respectfully submitted this 12th day of March 2003,

Adele Morris
Technology Coordinator
Craig County Public Schools
P.O. Box 245
Salem Ave.
New Castle, VA 24127
(540) 864-7550